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March 20, 2025

**VIA ECF**

Honorable Robyn F. Tarnofsky  
United States District Court Magistrate Judge  
United States District Court, Southern District of N.Y.  
500 Pearl Street  
New York, NY 10007

Re: Bashir Alhalemi v. City University of New York  
Case No: 24-cv-6975

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Dear Magistrate Judge Tarnofsky:

This office represents Defendant CITY UNIVERSITY OF NEW YORK (“CUNY”) in the above referenced action. I write to request an adjournment of the March 27, 2025 telephonic status conference (ECF 33) due to a scheduling conflict and for submission of Defendant’s intended response to the complaint.

Undersigned counsel is scheduled for a mandatory in-person Oral Argument on March 27 with the Judicial Panel on Multidistrict Litigation in Charlotte, North Carolina. As there is no set time for the Oral Argument on the docket, the undersigned respectfully requests to adjourn the March 27 status conference, at least, to a date other than that of affiant counsel’s North Carolina Oral Argument.

Additionally, where Defendant’s response to the complaint is due by March 28, 2025 (ECF 32), and where Defendant intends to move to dismiss the complaint in lieu of answer – also addressing Plaintiff’s proposed amended complaint currently held in abeyance (ECF 13) – adjournment of the March 27 conference would facilitate resolution on both the initial and proposed amended pleadings.

No previous request for an adjournment of the March 27 telephonic status conference has been made, and no other anticipated date will be affected by the requested adjournment. Defendant requested by email *pro se* Plaintiff’s consent to adjourn the March 27 conference, and *pro se* Plaintiff has consented to Defendant’s rescheduling request.

Thank you for your consideration in this matter.

Very truly yours,

/s/ Maxim Maiello

Maxim Maiello  
Assistant Corporation Counsel

cc: Bashir Alhalemi, Plaintiff *Pro Se*  
(via ECF and U.S. Postal Service)  
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